1 2 3 4 5 6 7 8 9	ISMAIL J. RAMSEY (CABN 189820) United States Attorney PAMELA T. JOHANN (CABN 145558) Chief, Civil Division ANDREW MAINARDI (NYBN 5431697) Assistant United States Attorney 1301 Clay Street, Suite 340S Oakland, CA 94612 Telephone: (510) 788-3509 Facsimile: (415) 436-7234 E-mail: andrew.mainardi@usdoj.gov Attorneys for Defendants UNITED STATES DISTRICT COURT		
11 12 13 14 15 16 17 18	NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION JEWISH LEGAL NEWS, INC., Plaintiff, V. STIPULATION TO CONTINUE CASE MANAGEMENT CONFERENCE; [Proposed] ORDER U.S. CUSTOMS AND BORDER PROTECTION AND U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT, Defendants. Defendants. Defendants. Defendants.		
20 21 22 23 24 25 26 27 28	Plaintiff and Defendant, by their attorneys of record ("The Parties"), hereby stipulate as follows: WHEREAS, Plaintiff filed the Complaint in this Freedom of Information Act ("FOIA") lawsuit on December 4, 2023. Dkt. No. 1; WHEREAS, the Parties filed two Joint Case Management Statements in this case on February 24, 2024 and August 8, 2024, which included stipulated requests to continue the Initial Case Management Conference that were granted by this Court. Dkt. Nos. 18-21; WHEREAS, there have been no other requests for time modifications in this matter; WHEREAS, document production pursuant to FOIA is nearing completion and because the STIPULATION; [Proposed] ORDER Case No.: 4:23-cv-06241-LJC		

1	Parties seek additional time to determine what, if any, issues may require the attention of the Court;		
2	THE PARTIES HEREBY STIPULATE AND REQUEST, pursuant to Civil Local Rule 6-1(b),		
3	that the Initial Case Management Conference, currently scheduled for December 12, 2024 at 1:30 p.m.,		
4	be continued to February 27, 2025 at 1:30 p.m., or a day and time that is suitable to the Court, and that		
5	the due date for filing the Case Management Statement be reset accordingly.		
6 7	Resp	ectfully submitted,	
8	B DATED: November 29, 2024 JAV	TCH LAW OFFICE	
9	MAF	s/ Mark L. Javitch* RK L. JAVITCH	
10	Attor	ney for Plaintiff	
11			
12			
13 14	DATED: November 29, 2024 ISMA	AIL J. RAMSEY	
15		ed States Attorney	
16		:/ Andrew Mainardi	
17	$\overline{\mathrm{BY}}$	ANDREW MAINARDI stant United States Attorney	
18	Attor	rneys for Defendants	
19			
20			
21	*In compliance with Civil Local Rule 5-1(i)(3), the filer of that counsel for Plaintiff has concurred in the filing of this	s document.	
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	STIPULATION; [Proposed] ORDER Case No.: 4:23-cv-06241-LJC		

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[PROPOSED] ORDER

The above STIPULATION is approved for this case and all parties shall comply with its provisions as follows: The Initial Case Management Conference, currently set for December 12, 2024 at 1:30 p.m., is hereby reset to February 27, 2025 at 1:30 a.m./p.m., and the due date for the Initial Joint Case Management Statement is reset to February 20, 2025.

IT IS SO ORDERED.

Dated: December 2, 2024

(Høn. Lisa J. Cisneros

STIPULATION; [Proposed] ORDER Case No.: 4:23-cv-06241-LJC

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